

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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DATE: SEP 12 1978

SUBJECT: ARCO et al PSD Application

FROM: Robert G. Courson, Chief *RGC*
Research, Training & Technical Support Branch

TO: Mike Johnston
Enforcement Division

On August 31, 1978, I sent you a memo identifying some information we need from the Company to complete the PSD application. Based on Rob Wilson's recent trip to Prudhoe Bay and examination of the proposed NSPS for gas turbines we have identified two additional information needs on the PSD application:

1. Physical Stack Height - Apparently the heights for many stacks that were used in the modeling were taken from engineering drawings and do not reflect the true height above the ground. Most stacks are based above ground because of the nature of construction in Prudhoe Bay. Some stacks are actually based on top of "broach" heaters. Consideration of the total stack height above ground may result in reduced concentrations for the several hot spots identified in the modeling analysis.

2. Plume Rise - The NSPS support document suggests that for gas turbines 70% of the normal Briggs plume rise should be used. The Company should discuss and defend the use of the full plume rise in their calculations or re-model using the 70% figure.

cc:
Bill Schmidt

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SEP 14 1978

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: AUG 31 1978

SUBJECT: ARCO et al PSD Application

FROM: Robert G. Courson, Chief *RLC*
Research, Training & Technical Support Branch

TO: Mike Johnston
Enforcement Division

S&A has reviewed the subject application and find we need one additional piece of information, namely estimates, with documentation, of the appropriate background ambient levels that should be added to the predicted (modeled) impacts from known sources. The estimates should be provided for each pollutant subject to PSD review.

cc:
Bill Schmidt

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AUG 31 1978

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